

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 20-cr-10012-IT
)	
PAUL BATEMAN,)	
Defendant.)	

MOTION TO FILE GOVERNMENT RESPONSE UNDER SEAL

The United States of America, by and through the undersigned Assistant United States Attorneys, respectfully seeks leave to file its response to the defendant's Motion to Compel Discovery (provided to the government on May 24, 2021 and filed under seal on May 25, 2021) under seal. As reason therefor, the government states that the response contains reference to sensitive information that is protected from public disclosure pursuant to the Protective Order issued on February 25, 2020. The government's response to the Motion will be provided to counsel for the defendant pursuant to the Protective Order.

Respectfully submitted,

NATHANIEL R. MENDELL
Acting United States Attorney

By: /s/ Anne Paruti
Anne Paruti
Mackenzie Queenin
Assistant U.S. Attorneys

Date: June 14, 2021

CERTIFICATE OF SERVICE

I, Anne Paruti, hereby certify that the foregoing was filed through the Electronic Court filing system and will be sent electronically to the registered participant as identified on the Notice of Electronic filing:

Dated: June 14, 2021

/s/ Anne Paruti
Assistant United States Attorney